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Attorney for Defendant,
ANTHONY ROY WILSON

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA
(Honorable James C. Mahan)

UNITED STATES OF AMERICA,)	CASE NO. 2:12-CR-00113-013-JCM
)	
Plaintiff,)	UNOPPOSED MOTION TO
)	MODIFY CONDITIONS OF
vs.)	SUPERVISED RELEASE
)	
ANTHONY ROY WILSON,)	
)	
Defendant.)	

COMES NOW, the defendant, ANTHONY WILSON, by and through his attorney, Frank T. Vecchione, and hereby moves to modify his conditions of supervised release to allow travel within the Central District of California.

This request is made on the following grounds:

- (1) On November 17, 2015, defendant ANTHONY WILSON was sentenced by this Court to time served and placed on two (2) years supervised release. Mr. WILSON was also ordered to complete forty (40) hours community service, pay an Assessment in the amount of \$100 and Restitution in the amount of \$115,700;
- (2) Defendant WILSON resides in Fallbrook, California, and has had supervision transferred to the United States Probation Department for the Southern District of California;
- (3) Mr. WILSON resides in Northern San Diego County, in close proximity

1 to the Central District of California; his employment requires travel to the cities of
2 Temecula and Los Angeles in the Central District of California (see attached letter
3 from employer);

4 (4) Mr. WILSON respectfully requests his conditions of supervised release
5 be modified to allow him to travel within the Central District of California;

6 (5) Counsel for the United States, Alison L. Anderson, U.S. Department of
7 Justice, Criminal Division, has no opposition to Mr. WILSON's conditions of
8 supervised release being modified to allow him to travel within the Central District
9 of California.

10 For the above-mentioned reasons, defendant ANTHONY WILSON requests
11 his conditions of supervised release be modified to allow travel within the Central
12 District of California.

13 Respectfully submitted,

14
15 Dated: December 16, 2015

s/Frank T. Vecchione
FRANK T. VECCHIONE
Attorney for Defendant
ANTHONY ROY WILSON
Email: ftvlaw@gmail.com

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA
3 (Honorable James C. Mahan)

4 UNITED STATES OF AMERICA,)
5 Plaintiff,)
6 vs.)
7 ANTHONY ROY WILSON,)
8 Defendant.)

CASE NO. 2:12-CR-00113-013-JCM
PROPOSED ORDER

9
10 **FINDINGS OF FACT**

11 Based on the Defendant's pending Unopposed Motion to Modify
12 Conditions of Supervised Release, and good cause appearing therefore, the Court
13 hereby finds that:

14 (1) The parties are in agreement to allow defendant's conditions of
15 supervised release be modified to allow him to travel within the Central District of
16 California.

17 (2) This Court is convinced that an adequate showing has been made
18 which demonstrates the need for defendant WILSON's conditions of supervised
19 release to be modified. This decision is based on the following findings:

20 a. Defendant WILSON must be able to travel within the Central
21 District of California in order to maintain his current
22 employment.

23 (3) For all the above-stated reasons, the ends of justice would best be
24 served by allowing defendant WILSON's conditions of supervised release to be
25 modified.

26 //


27 //

28 //

ORDER

IT IS THEREFORE ORDERED that the Conditions of Supervised Release as to ANTHONY WILSON be modified to allow him to travel within the Central District of California.

Dated: December 21, 2015.


UNITED STATES DISTRICT JUDGE

Collective Media Corporation

1712 Pioneer Ave #1699
Cheyenne WY 82001
980-298-1100

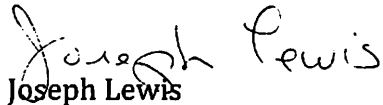
December 3rd 2015

RE: Anthony Roy Wilson

To Whom It May Concern:

Mr. Wilson is employed by Collective Media Corporation, serving the company as a Marketing Manager. Some of his job tasks are website design, marketing and development. We require Mr. Wilson to be able to meet clients regularly and work on projects in San Diego, Temecula and in Los Angeles. His current task is called Let's Vino. It focuses on the wineries and tour industry in Temecula.

Sincerely



Joseph Lewis
President, Collective Media Corporation

FRANK T. VECCHIONE
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Attorney for Defendant,
ANTHONY ROY WILSON

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA
(Honorable James C. Mahan)

UNITED STATES OF AMERICA,)	CASE NO. 2:12-CR-00113-013-JCM
)	
Plaintiff,)	PROOF OF SERVICE
)	
vs.)	
)	
ANTHONY ROY WILSON,)	
)	
Defendant.)	

IT IS HEREBY CERTIFIED THAT:

I, LALANYA N. HAM, am a citizen of the United States and am at least eighteen years of age. My business address is 105 West F Street, Ste. 215, San Diego, California, 92101.

I am not a party to the above-entitled action. I hereby certify that I have caused to be served: **Unopposed Motion to Modify Conditions of Supervised Release** to the following ECF participants on this case:

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on December 16, 2015.


LALANYA W. HAM